Phone #:

E-mail Address:

Invoice

312 789 9700

105 West Adams Street Suite 2900 Chicago, Illinois 60603 Brown@ConverseBrown.com

Invoice #

Bill To:

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/10/2006

Terms:

Due on receipt

Date of activity	Description of activity	Rate	Time (in hours)	Amount
12/7/2005	Discussed Mr. Brooks' Bekins case with JGB, researched possible tort claims, called Mr. Brooks and requested he send emails and documentation. AGT	185.00	1.35	249.75
12/7/2005	AGT - Researched tariff levels and how this affects Bekins' liability, reviewed tariff disclosure in Bekins' contract.	185.00	0.76667	141.83
12/7/2005	(NO CHARGE) AGT - Drafted representation letter for Mr. Brooks.	0.00	0.26667	0.00
12/8/2005	AGT - Continued research on tariff limitations and furniture movers, looked at US Code for interstate transportation, researched the Surface Transportation Board, TC Larry Herzick from Surface Transportation Board re tariff limitations.	185.00	1.86667	345.33
12/9/2005	AGT - Continued research on the state of the	185.00	1.4	259.00
12/9/2005	AGT - TC w/Mr. Brooks re availability for TC w/JGB.	185.00	0.08333	15.42
12/12/2005	AGT - VM Doug Brooks re status of FedEx documents.	185.00	0.05	9.25
12/12/2005	AGT - TC w/Doug Brooks re nature of claims, does he sent us, Bill of Lading doe to be FedEx'd; conversation w/JGB possible claims. JGB advised	185.00	0.6	111.00
Thank you for your b	usiness. We appreciate your prompt payment.	Tota	al	

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Date

1/10/2006

Terms:

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Date of activity	Description of activity	Rate	Time (in hours)	Amount
12/12/2005	AGT - researched tariff level of liability - is Mr. Brooks' declared amount less than \$0.60/pound?, TC w/Mr. Brooks re claim, reviewed docs sent by Mr. Brooks	185.00	0.65	120.25
12/12/2005	AGT - Continued research on tariffs and how that affects liability.	185.00	0.08333	15.42
12/13/2005	AGT - Reviewed Bekins excerpts from Tariff Governing Transportation.	185.00	0.56667	104.83
12/13/2005	AGT - Began drafting complaint.	185.00	2.86667	530.33
12/14/2005	AGT - Researched Moorman doctrine of economic damages only in contract law, emotional distress damages in contract law in Illinois law, researched UCC law re limitation of damages, discussion w/JGB re limitation of damages and records office to get entire tariff.	185.00	4.18333	773.92
12/14/2005	(NO CHARGE) AGT - Reviewed and revised representation letter.	0.00	0.61667	0.00
12/14/2005	AGT - Continued drafting complaint.	185.00	2.16667	400.83
Thank you for your b	ousiness. We appreciate your prompt payment.	Tota	nl	\$3,077.16

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Chicago, Illinois 60603

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Invoice #

Bill To:

**Suite 2900** 

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 2/21/2006

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
12/15/2005	AGT - continued drafting complaint, discussed w/PEC status of defunct National Moving & Storage, Inc, and how that affects case, searched secretary of state website for National Moving.	185.00	5.35	989.75
12/16/2005	AGT - continued to revise complaint, adding agency elements for 2 agent movers.	185.00	1.38333	255.92
12/19/2005	AGT - email Brooks regarding status of suit.	185.00	0.06667	12.33
12/19/2005	AGT - continued revising complaint	185.00	2.8	518.00
12/27/2005	AGT - revised Consumer Fraud Act claim in complaint.	185.00	0.68333	126.42
1/10/2006	agt - Drafted letter to Bekins demanding production of documents.	185.00	0.3	55.50
1/11/2006	agt - revised and sent letter to Bekins demanding a response to our request for documents, emailed Mr. Brooks regarding status.	185.00	0.78333	144,92
1/16/2006	agt - emailed Mr. Brooks regarding factual allegations in his complaint.	185.00	0.28333	52.42
1/17/2006	agt - discussion over next steps with case with JGB and email to Mr. Brooks.	185.00	0.18333	33.92
1/23/2006	agt - emailed Mr. Brooks re information finally received from Bekins, discussed complaint with Clay and JGB.	185.00	0.48333	89.42
1/24/2006	agt - revised complaint with Mr. Brooks' comments on factual allegations.	185.00	0.5	92.50
1/25/2006	agt- reviewed Mr. Brooks' email regarding Bekins' local fix-it guy.	185.00	0.05	9.25
Thank you for your t	ousiness. We appreciate your prompt payment.	Tota		**************************************

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Web Site	Fax#
www.ConverseBrown.com	312 422 0595

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Invoice

312 789 9700

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Invoice #

105 West Adams Street Suite 2900 Chicago, Illinois 60603

Bill To:

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 2/21/2006

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
1/30/2006	agt - TC with Mr. Brooks regarding complaint and fix-it	185.00	0.13333	24.67
2/2/2007	guys, discussion with IGB regarding filing complaint.	[		
2/3/2006	agt - revised complaint pursuant to Jonathan Nachsin's comments.	185.00	0.9	166.50
2/7/2006	agt - researched Moorman doctrine and pleading	185.00	0.31667	58.58
	negligence and breach of contract in the alternative.	·		50.50
2/8/2006	agt - continued research on Moorman doctrine and	185.00	0.76667	141.83
	economic damages for pleading in the alternative.			
2/9/2006	Reviewed draft Complaint from co-counsel; revisions	305.00	0.3	91.50
	regarding elements of Consumer Fraud, discussion about		1	
	elements of bailment claim, tariff language. JGB	ŀ		
2/9/2006	agt - revisions and case law on service contracts and	185.00	0.53333	98.67
	non-economic damages.			
2/10/2006	Reviewing revised draft of Complaint from Amanda;	305.00	0.2	61.00
	revisions to same, email on same.			
2/10/2006	agt - final revisions with JGB's comments to complaint.	185.00	0.26667	49.33
2/13/2006	agt - Prepared civil cover letter and summons for	185.00	0.88333	163.42
	complaint, redrafted complaint with revisions from Doug			
A 14 4 18 A A A	Brooks.			
2/14/2006	agt - filed Doug Brooks complaint.	185.00	0.23333	43.17
2/15/2006	agt - Reviewed summons and how to serve White and	185.00	0.46667	86.33
	National Moving, reviewed filed complaint and	ļ		
	summons.			
Thank you for your b	business. We appreciate your prompt payment.	<b>-</b>		
		Tota	31	

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Bill To:

Mr. Douglas Brooks		
3945 Brookline Drive		
Alpharetta, GA 30022		
1,		

Date

2/21/2006

Terms:

Due on receipt

Date of activity	Description of activity	Rate	Time (in hours)	Amount
2/16/2006	agt - researched ability to serve White or National Moving in Illinois.	185.00	1.53333	283.67
2/17/2006	agt - reviewed complaints filed by Alice and orders for out-of-state service.	185.00	0.35	64.75
2/20/2006	agt - read and responded to email regarding timelines and response from Bekins.	185.00	0.3	55.50
		}		
			}	
		İ		
Thank you for your b	usiness. We appreciate your prompt payment.	Tota		\$3,769.27

Jeffrey Grant Brown, P.C. 105 West Adams Street **Suite 3000** Chicago, IL 60603

Phone # 312 789 9700 Invoice

Bill To

Date 2/21/2006

Due Date 2/21/2006

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date of Service	Description	Time (in tenths of hours)	Rate	Amount
2/15/2006 2/16/2006 2/17/2006 2/17/2006	Filing fees: Circuit Court w/jury Process server: Service on Bekins Process server: Service on National Process server: Service on White Moving Total Reimbursable Expenses		524.00 23.40 45.00 39.00	524.00 23.40 45.00 39.00 631.40
	giago Wasanya ista yaya na manta ayan a			

Thank you for your business. We appreciate your prompt payment.

This Invoice Total Due: \$631.40

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105 West Adams Street

Suite 2900 Chicago, Illinois 60603 Brown@ConverseBrown.com

Invoice #

Bill To:

Mr. Douglas Brooks	
3945 Brookline Drive	
Alpharetta, GA 30022	

Date

2/21/2006

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
2/21/2006	Cost advanced by JGBPC: filing, service, paid by JGBPC	631.40		631.40
			{	
		Tota	ıl	\$631.40

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Bill To:

Mr. Douglas Brooks		
3945 Brookline Drive		
Alpharetta, GA 30022		

Date

3/6/2006

Terms:

Due on receipt

Date of activity	Description of activity	Rate	Time (in hours)	Amount
2/17/2006	Filed civil summons; reviewed and prepared summons and complaints for service in Colorado and Nevada. AY	75.00	2	150.00
2/24/2006	agt - assigned paralegal, Alice Ye, to check return of service at Daley Center.	185.00	0.08333	15.42
3/3/2006	agt - received, reviewed, arranged for filing service of process from A-1 Process Private Process Servers.	185.00	0.31667	58.58
3/6/2006	December, 2005 Westlaw charges	63.30		63.30
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hank you for your b	Jusiness. We appreciate your prompt payment.			<del></del>
		Tota	31	\$287.30

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Bill To:

Mr. Douglas Brooks	
3945 Brookline Drive	
Alpharetta, GA 30022	
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Date

4/4/2006

Terms:

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Date of activity	Description of activity	Rate	Time (in hours)	Amount
2/9/2006	Continued research on Moorman doctrine and alternative pleading for complaint. AGT	185.00	1.91667	354.58
3/7/2006	Call to process server to confirm address for service on National is accurate, because it does not appear on Google maps. JGB	305.00	0.3	91.50
3/9/2006	Filed return of service for White Moving & Storage - special process server. AGT	185.00	0.51667	95.58
3/15/2006	Answered email regarding time for defendant's answer, discussed time period for answer with JGB. AGT	185.00	0.2	37.00
3/15/2006	Discussion with AGT regarding likely response time of defendants. JGB	305.00	0.1	30.50
3/23/2006	Reviewed Bekins' notice of removal, researched provisions of ICC Termination Act which defendant relied upon for removal. AGT	185.00	3.68333	681.42
3/24/2006	Researched removal of claim to federal courts, AGT	185.00	1.1	203.50
3/24/2006	Reviewed defendants' motion to dismiss. AGT	185.00	1.75	323.75
3/24/2006	Researched Bekins' ability to AGT	185.00	0.98333	181.92
3/24/2006	Continued researching for response to defendants' motion to dismiss. AGT	185.00	0.78333	144.92
3/24/2006	Call to Doug to discuss status. JGB	305.00	0.2	61.00
3/24/2006	(Second slip today) Received, reviewed removal petition, motion to dismiss. Discussion with AGT about research on same. JGB	305.00	0.3	91.50
YOUR ACCOUNT I	BALANCE IS PAST DUE.	Tota		<del> </del>

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SW AND COMMISSION

105 West Adams Street Suite 2900 Chicago, Illinois 60603 Brown@ConverseBrown.com

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Bill To:

Mr. Douglas Brooks
3945 Brookline Drive
Alpharetta, GA 30022

Date

4/4/2006

Terms:

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Date of activity	Description of activity	Rate	Time (in hours)	Amount
3/28/2006	Reviewed filing on Rule 77(d). Call to opposing counsel about same; discussed status. Received Rule 77(d) letter from court. Forwarded copy to counsel. JGB	305.00	0.38333	116.92
3/28/2006	Reviewed Rule 77d letter. AGT	185.00	0.16667	30.83
3/28/2006	Researched Judge Anderson's opinions on Carmack Amendment, continued researching	185.00	1.5	277.50
3/28/2006	Researched claim period for Bekins damage claims and compliance with same. AGT	185.00	0.21667	40.08
3/28/2006	Work on drafting amended complaint, AGT	185.00	0.91667	169.58
3/30/2006	Checked for motion to remove and notice of motion, researched rules on amending complaint. AGT	185.00	0.1	18.50
3/7/2006	Cost advanced: additional service of process charge for service on National.	45.00		45.00
YOUR ACCOUNT I	BALANCE IS PAST DUE.	Tota	al	\$2,995.58

Jeffrey Grant Brown, P.C. 105 West Adams Street Suite 3000 Chicago, IL 60603

Phone # 312 789 9700

Invoice

Bill To

Date 6/5/2007 Due Date 6/5/2007

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date of Service	Description	Time (in tenths of hours)	Rate	Amount
8/16/2006 8/16/2006 8/17/2006 9/14/2006 1/23/2007 3/19/2007	computerized legal research charges computerized legal research charges search fee on records request witness fee for deposition Brooks deposition transcript Hearing on motion for deposition Total Reimbursable Expenses		360.49 120.15 10.00 50.02 704.05 30.80	360.4 120.1 10.0 50.0 704.0 30.8 1,275.5

This Invoice Total Due: \$1,275.51

E-mail Address:

Invoice

## Converse & Brown, LLC

105 West Adams Street Suite 2900 Chicago, Illinois 60603 312 789 9700 Brown@ConverseBrown.com

Invoice #

Bill To:

Mr. Douglas Brooks	
3945 Brookline Drive	
Alpharetta, GA 30022	
· .	

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
4/4/2006	AGT - drafted amended complaint for federal court.	185.00	0.48333	89.42
4/5/2006	AGT - continued drafting amended complaint for federal court.	185.00	3.35	619.75
4/5/2006	AGT - researched causes of action for emotional distress.	185.00	1.2	222.00
4/5/2006	Call to Doug regarding his status, approval	185.00	0.25	46.25
4/6/2006	AGT - continued researching causes of action to include damages for emotional distress.	185.00	0.3	55.50
4/6/2006	AGT - continued drafting amended complaint.	185.00	1.91667	354.58
4/7/2006	AGT - responded to email from Mr. Brooks regarding motion for summary judgment and amended complaint.	185.00	0.2	37.00
4/8/2006	AGT - continued drafting amended complaint.	185.00	0.86667	160.33
4/10/2006	Continued drafting amended complaint for federal court.	185.00	1.4	259.00
4/13/2006	Continued drafting amended complaint, researched violations of Carmack Amendment, discussed complaint with JGB and claims.	185.00	2.65	490.25
4/13/2006	CBW - researching impact of Carmak Amendment on claims of infliction of emotional distress. Drafting memo regarding research.	185.00	2.86667	530.33
4/14/2006	Reviewed CBW's research on intentional infliction emotional distress for claims under Carmack and integrated into amended complaint. AGT	185.00	1.25	231.25
		Tot	al	

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#### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 13 of 65 PageID #:2048

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Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date

1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
4/14/2006	CBW - completed memorandum of law regarding pleading intentional infliction of emotional distress around Carmack. Analysis of	185.00	0.5	92.50
4/17/2006	Continued drafting amended complaint with intentional infliction emotional distress claims and consumer fraud claims, researched claims under law. AGT	185.00	4.01667	743.08
4/18/2006	Continued drafting amended complaint. AGT	185.00	2.08333	385.42
4/24/2006	Discussed amended complaint with JGB, causes of action, email to Mr. Brooks regarding amended complaint. AGT	185.00	0.28333	52.42
4/27/2006	Discussed filing of amended complaint with JGB, researched rules federal procedure. AGT	185.00	0.11667	21.58
4/27/2006	Reviewed status of receipt of information from Doug regarding  Research under Rule 15 regarding whether we need leave to amend the Complaint; we do not. Discussion with AGT to finalize same and file by tomorrow.	305.00	0.2	61.00
4/28/2006	Checked Judge Anderson's standing order for discovery rules, drafted letter informing Brooks	185.00	0.48333	89.42
4/28/2006	Letter to counsel seeking tariff.	305.00	0.2	61.00
5/4/2006	Reviewing, revisions to Amended Complaint for filing.	305.00	0.4	122.00
		Tota	al	

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Invoice #

Bill To:

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
5/8/2006	Continued reviewing Bekins' Tariff for pertinent	185.00	2.33333	431.67
	provisions. AGT			
5/8/2006	Continued drafting 26a disclosures, drafted 26f	185.00	3.3	610.50
	conference report. AGT			
5/9/2006	Continued drafting 26f conference report and revised 26a	185.00	2.15	397.75
	disclosures, discussed tariff provisions with JGB. AGT			
5/18/2006	Reviewed Defendants' 12b2 motion to dismiss and	185.00	0.51667	95.58
	answer to federal court claim. AGT			
5/22/2006	Discussion with Doug about possibility of settlement. He	305.00	0.65	198.25
	authorizes settlement at Drafted			
	letter to opposing counsel, presenting settlement demand.	•		
5/23/2006	Brief review of motions to dismiss, Answer. Discussion	305.00	0.2	61.00
	with AGT about form of response on same. JGB			
5/30/2006	Drafted response to 12b6 motion to dismiss. AGT	305.00	1.2	366.00
5/31/2006	Continued drafting response to 12b6 motion to dismiss.	185.00	4.05	749.25
	AGT			
5/31/2006	Drafted response to 12b2 motion. AGT	185.00	1.3	240.50
6/6/2006	Reviewed order striking motion to dismiss. AGT	185.00	0.03333	6.17
6/8/2006	Researched and tracked down code provision providing	185.00	0.98333	181.92
	for attorneys' fees when not given warning of mediation			
	alternative. AGT		İ	
		<u> </u>		
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### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 15 of 65 PageID #:2050

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105 West Adams Street Suite 2900 Chicago, Illinois 60603 312 789 9700 Brown@ConverseBrown.com

Invoice #

Bill To:

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
6/15/2006	Attended status call in state court for removed action where defendant should have given state court notice of removal, but didn't so the case was on the call but then between the time the case was first called and recalls the court clerk figured out that the case had been removed so didn't recall so I sat there waiting for it to be called. AGT	185.00	1.9	351.50
6/20/2006	Researched Andersen's standing order on status hearings and report of parties' planning, drafted discovery plan.  AGT	185.00	0.13333	24.67
6/21/2006	Continued drafting response to 12b6 motion. AGT	185.00	6.88333	1,273.42
6/21/2006	Drafted response to 12b2 motion to dismiss. AGT	185.00	0.3	55.50
6/22/2006	Revisions to both responses to motions to dismiss; research on Carmack Amendment.	305.00	6.5	1,982.50
6/22/2006	Continued responding to 12b2 motion to dismiss. AGT	185.00	0.21667	40.08
6/22/2006	Researched what happens if we voluntarily dismiss party in fed. court, researched personal jurisdiction over White Moving. AGT	185.00	6.38333	1,180.92
6/23/2006	CBW - research regarding liability of agent under Carmak Amendment.	185.00	4.63333	857.17
6/23/2006	Revisions to 12(b)(2) Motion, 12(b)(6) motion. Reviewing case law on both motions. Arranged filing of same.	305.00	4.3	1,311.50
6/26/2006	Reviewed response to 12b6 and 12b2 motions to dismiss. AGT	185.00	0.43333	80.17
	•	Tota	al	

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### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 16 of 65 PageID #:2051

Converse & Brown, LLC

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Invoice #

105 West Adams Street Suite 2900 Chicago, Illinois 60603

Bill To:

Mr. Douglas Brooks 3945 Brookline Drive		
Alpharetta, GA 30022		

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
6/26/2006	Made courtesy copy of response to 12b6 and 12b2 response for judge. AGT	185.00	0.65	120.25
6/26/2006	Delivered courtesy copies of responses to motion to drop box for Judge Andersen. AGT	185.00	0.26667	49.33
6/27/2006	Prepared 26a1 disclosures. AGT	185.00	0.36667	67.83
6/27/2006	Reviewed, copied documents for 26a1B disclosure. AGT	185.00	0.73333	135.67
6/28/2006	Revised 26a disclosures with JGB's comments. AGT	185.00	3.88333	718.42
6/29/2006	Emailed Brooks regarding documents to be produced to other side. AGT	185.00	0.06667	12.33
6/29/2006	Continued to draft 26a disclosures. AGT	185.00	1.11667	206.58
6/30/2006	CBW - copied and delivered 26(a) disclosures to opposing counsel.	185.00	0.48333	89.42
7/5/2006	Reviewed plaintiff's 26a disclosures. AGT	185.00	0.08333	15.42
7/7/2006	Reviewed Bekins' reply brief for 12b2 and 12b6 motions.  AGT	185.00	0.51667	95.58
7/7/2006	Researched liability of carriers who are agents of carrier in regards to interstate transportation. AGT	185.00	0.06667	12.33
7/9/2006	Researched agency liability when cross state lines with transportation of household goods. AGT	185.00	0.38333	70.92
7/10/2006	Continued research on agency liability when transportation crosses state lines, researched statutes and annotated cases, researched code of federal regulations, contacted Federal Motor Carrier Safety Administration, contacted surface transportation board. AGT	185.00	3.63333	672.17
		Tota	al	

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105 West Adams Street Suite 2900 Chicago, Illinois 60603

Bill To:

Mr. Douglas Brooks	
3945 Brookline Drive	
Alpharetta, GA 30022	
Į	

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
7/10/2006	Drafted for Doug Brooks. AGT	185.00	0.71667	132.58
7/10/2006	Drafted requests to produce for defendants. AGT	185.00	0.01667	3.08
7/10/2006	Reviewed defendant's arguments in reply brief on jurisdiction; discussion with co-counsel about same; reviewed law cited in section 309; email to client for status on depositions.	305.00	0.3	91.50
7/11/2006	Continued drafting requests to produce. AGT	185.00	0.73333	135.67
7/12/2006	Continued drafting request to produce. AGT	185.00	3.21667	595.08
7/12/2006	Drafted interrogatories. AGT	185.00	1.25	231.25
7/12/2006	Call to opposing counsel regarding status of dates for deposition. Email to client on same. Discussion with Amanda on same. JGB	305.00	0.35	106.75
7/13/2006	Reviewed request to produce and first set of interrogatories. AGT	185.00	1.76667	326.83
7/13/2006	Reviewed request to produce and first set of interrogatories. AGT	185.00	1.76667	326.83
7/18/2006	Drafted letter requesting defendant's 26 a disclosures, revised interrogatories and requests to produce. AGT	185.00	2.01667	373.08
7/18/2006	Revisions to AGT discovery requests.	185.00	0.6	111.00
7/19/2006	Received, reviewed comments regarding witnesses to the packing job in Colorado. Response to same. Received, reviewed disclosure from opposing counsel.	305.00	0.2	61.00
		Tot	al	

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#### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 18 of 65 PageID #:2053

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# Converse & Brown, LLC

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Brown@ConverseBrown.com

Invoice #

Bill To:

Mr. Douglas Brooks	
3945 Brookline Drive	
Alpharetta, GA 30022	
_	

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
7/20/2006	Revised discovery requests using information, drafted supplemental 26a1 letter, reviewed Bekins' 26a disclosures, drafted letter clarifying Bekins' 26a disclosures. AGT	185.00	1.18333	218.92
7/21/2006	Revised discovery requests with Doug Brooks' suggestions. AGT	185.00	1.35	249.75
7/21/2006	Reviewing plaintiff's first set of interrogatories for accuracy. Review of plaintiff's first request for production of documents for accuracy. CBW	185.00	0.96667	178.83
7/25/2006	Discussion with JGB and John Busher from Bekins' counsel's office regarding status in court, discovery, discovery deadlines. AGT	185.00	0.53333	98.67
7/25/2006	Researched 26a rules and when parties must disclose even though they do not believe they are properly party of suit. AGT	185.00	0.86667	160.33
7/25/2006	Discussion with AGT about tomorrow's status, status of discovery, discovery responses. Discussion with opposing counsel about tomorrow's status: they want to keep discovery open until next summer. Discussion with Doug about same, obtaining medical records.	305.00	1.05	320.25
7/26/2006	Continued researching timing of 26a disclosures with motions to dismiss. AGT	185.00	0.48333	89.42
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# Converse & Brown, LLC

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Invoice #

Bill To:

Mr. Douglas Brooks	•	
3945 Brookline Drive		
Alpharetta, GA 30022		

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
7/26/2006	Drafted answers to discovery requests, responded to Brooks' 7.20.06 email regarding	185.00	3.03333	561.17
7/26/2006	Attended status hearing with Judge Keys, discussed with JGB. AGT	185.00	0.63333	117.17
7/26/2006	Drafted letter to Stringer clarifying judge's order on discovery. AGT	185.00	0.31667	58.58
7/27/2006	Responded to Brooks' email. AGT	185.00	0.2	37.00
7/28/2006	Drafted document request for documents identified to Bekins' 26a disclosures. AGT	185.00	0.43333	80.17
7/28/2006	Drafted letter to Doug Brooks on AGT	185.00	0.35	64.75
7/28/2006	Continued drafting response to Bekins' request for production of documents. AGT	185.00	1.83333	339.17
8/1/2006	Reviewed Bekins' insurance policy disclosed in its 26a disclosures. AGT	185.00	0.58333	107.92
8/4/2006	Drafted email to Doug regarding Bekins' discovery requests, responded to email. AGT	185.00	0.3	55.50
8/8/2006	Discussion with JGB regarding answers to Bekins' Interrogatories, VM to Brooks. AGT	185.00	0.3	55.50
8/8/2006	Drafted answers to Bekins' Interrogatories. AGT	185.00	0.63333	117.17
8/9/2006	Continued drafting answers to interrogatories, VM to City of Alpharetta police regarding records, left VM for Stringer re subpoenas for Williams and Reed. AGT	185.00	1.75	323.75
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Bill To:

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
8/9/2006	Discussion with Doug about	305.00	0.35	106.75
8/10/2006	Continued answering interrogatories, researched unilaterally not answering interrogatories over 25, TC with Pam from Alpharetta regarding police report, received police report. AGT	185.00	2.91667	539.58
8/10/2006	Researched intentional infliction emotional distress claims with Carmack Amendment in 7th Circuit. AGT	185.00	0.9	166.50
8/15/2006	TC with Stringer regarding addresses of truck drivers, Keys as judge for everything, email to JGB regarding same. AGT	185.00	0.2	37.00
8/16/2006	Discussion with Doug regarding  AGT	185.00	0.6	111.00
8/17/2006	Reviewing documentation from Brooks.	185.00	0.4	74.00
8/17/2006	Contacted Denver police department to request police report on theft, drafted letter requesting report. AGT	185.00	0.6	111.00
8/17/2006	Reviewed Doug's discovery answers. AGT	185.00	0.83333	154.17
8/19/2006	Drafted answers to Bekins' discovery requests. AGT	185.00	1.53333	283.67
8/21/2006	Discussion with AGT regarding changed cause of action under CFR for notice of time to file claim; reviewed stated cause of action. Reviewed interrogatories from defendant; discussed response to same with AGT. Reviewed draft of document response; revisions to same.	305.00	0.35	106.75
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Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
8/21/2006	(Second slip today). Received, reviewed email from opposing counsel requesting extension on discovery, inspection of property. Responded to same.	305.00	0.3	91.50
8/21/2006	Continued drafting requests to produce answers. AGT	185.00	1.93333	357.67
8/21/2006	Drafted response to Int, TC with Brooks getting answers to Int. AGT	185.00	4.75	878.75
8/21/2006	Preparing for filing Response to Defendant's Bekins Van Lines, LLC's Interrogatories to Plaintiff. Review and incorporation of revisions into Plaintiff's response filing. Copying supporting documents for Plaintiff's response filing. CBW	185.00	0.78333	144.92
8/23/2006	Reviewed and revised discovery responses. AGT	185.00	0.01667	3.08
8/23/2006	Researched summary judgment records of Keys v. Andersen. AGT	185.00	0.03333	6.17
8/23/2006	Responded to email regarding discovery answers. AGT	185.00	0.06667	12.33
8/26/2006	Reviewed our discovery responses. AGT	185.00	1.83333	339.17
8/29/2006	TC with employee at Denver Police Department, emailed Doug to	185.00	0.1	18.50
8/30/2006	Drafted interrogatory answer verification for Doug Brooks and emailed to him. AGT	185.00	0.18333	33.92
8/31/2006	Attached verification to Interrogatory answers, drafted certs of service. AGT	185.00	0.18333	33.92
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### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 22 of 65 PageID #:2057

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Invoice # 322

Bill To:

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date

1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
8/31/2006	drafted letter regarding 2nd extension of time for discovery responses. AGT	185.00	0.23333	43.17
8/31/2006	Revised Response to Interrogatories. AGT	185.00	0.65	120.25
8/31/2006	Reviewing discovery response from Brooks.	305.00	0.73333	223.67
9/1/2006	Responded to Doug Brooks' email re from Bekins. AGT	185.00	0.15	27.75
9/1/2006	Made copies of responses to interrogatories and requests to produce. AGT	185.00	1.08333	200.42
9/1/2006	Revised requests to produce with Bentz invoices. AGT	185.00	0.55	101.75
9/11/2006	Researched negligent infliction of emotional distress claims. AGT	185.00	1.81667	336.08
9/11/2006	Researched negligent infliction of emotional distress claims. AGT	185.00	2.53333	468.67
9/11/2006	drafted letter to Stringer regarding too many extensions for discovery. AGT	185.00	1.23333	228.17
9/11/2006	Revised letter to Stringer demanding defendants' discovery responses. AGT	185.00	0.48333	89.42
9/13/2006	Discussion with AGT as to status of discovery, likely subject areas for a 30(b)(6) deposition of Bekins, regardless of ruling on motion to dismiss.	305.00	0.2	61.00
9/13/2006	Responded to emails from Doug regarding AGT	185.00	0.1	18.50
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#### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 23 of 65 PageID #:2058

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## Converse & Brown, LLC

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Invoice #

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Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
9/13/2006	TC with Stringer regarding when we are going to get discovery, tomorrow by noon, possible dates for plaintiff's deposition, discussion with JGB regarding discovery we need. AGT	185.00	0.31667	58.58
9/14/2006	Reviewing Judge Keys and Judge Andersen Carmack cases. CBW	185.00	0.03333	6.17
9/14/2006	Reviewed Bekins' discovery responses. AGT	185.00	0.38333	70.92
9/14/2006	Drafted subpoenas for drivers, discussion with JGB regarding subpoenas, draft subpoena for Bentz & Weathersby, drafted 30b6 notice of dep for Bekins. AGT	185.00	3.43333	635.17
9/15/2006	Continued researching matter of specific judge rulings on Carmak Amendment. CBW	185.00	2.91667	539.58
9/15/2006	Drafted motion to compel discovery from other parties, reviewed discovery responses to interrogatories and documents produced, emailed Doug for good deposition dates. AGT	185.00	2.81667	521.08
9/15/2006	Drafted letter to Stringer of Brooks' available dep dates and copies of subpoenas, faxed, drafted cert of service, discussed sending copies of subpoena rule with JGB, called Willy Williams, drafted 37.2 letter. AGT	185.00	1.38333	255.92
9/15/2006	Drafted dep notice for Richard Reed. AGT	185.00	0.08333	15.42
9/15/2006	Reviewed letters sent by Stringer regarding deposition of Brooks, subpoena of Williams and Bentz & Weathersby and 37.2. AGT	185.00	0.4	74.00
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### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 24 of 65 PageID #:2059

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# Converse & Brown, LLC

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	Mr. Douglas Brooks
	3945 Brookline Drive
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Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
9/18/2006	Discussion with AGT regarding discovery dispute of subpoenaed witnesses. Research assignment to AGT. Drafting letter to opposing counsel. Discovery	305.00	1.4	427.00
9/18/2006	conference with opposing counsel pursuant to Rule 37.2. Continued drafting and researching memo on Carmack amendment and distinct and independent causes of action. CBW	185.00	1.76667	326.83
9/18/2006	Researched difference between fact witness and expert witness, ex parte communications with expert witnesses, whether witness can be expert if part of the litigation, protective orders for experts. AGT	185.00	2.51667	465.58
9/18/2006	TC with Stringer regarding discovery issues, review JGB's letter to Stringer regarding our TC. AGT	185.00	0.81667	151.08
9/19/2006	Email to and from Doug regarding	305.00	0.15	45.75
9/19/2006	(Second slip today) Discussion with AGT about status of discovery; reviewed B & W reports; discussed their deposition as experts vs. fact witnesses.	305.00	0.55	167.75
9/19/2006	Email to Stringer pursuant to Rule 37 setting out our differences over discovery, continued drafting notice of dep for Richard Reed. AGT	185.00	2.38333	440.92
9/19/2006	Withdraw subpoena research, drafted letter withdrawing subpoena, researched Bekins Move Management Company - is it a separate entity?	185.00	1.53333	283.67
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### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 25 of 65 PageID #:2060

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Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
9/19/2006	Drafted second set of interrogatories, drafted second request to produce, discussion with JGB regarding letter to Stringer and notices of deposition. AGT	185.00	0.93333	172.67
9/19/2006	Discussed notices of deps for Williams, Reed, letter to Stringer. JGB	305.00	0.4	122.00
9/20/2006	Drafted motion to compel discovery from defendants National and White, drafted certification pursuant to Rule 37 and Local Rule 37.2, researched Defendants' defenses. AGT	185.00	3.96667	733.83
9/20/2006	Drafted amended 30b6 notice of deposition, served notice of deposition, read and responded to Stringer's emails re deposition and discovery disputes. AGT	185.00	1.08333	200.42
9/21/2006	Revised motion to compel and assisted JGB in revising.  AGT	185.00	0.71667	132.58
9/22/2006	Organized courtesy copy for Judge Keys of motion to compel. AGT	185.00	0.36667	67.83
9/22/2006	Messengered courtesy copies to Keys of motion to compel. AGT	185.00	0.16667	30.83
9/22/2006	Revised motion to compel, filed motions, discovery in case file. AGT	185.00	0.03333	6.17
9/25/2006	Organized and reviewed documents sent by Bekins for discovery responses, motion to compel and correspondence. AGT	185.00	0.43333	80.17
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Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
9/27/2006	Attendance in court for conversation with opposing counsel, prior to status call. JGB	305.00	0.35	106.75
9/27/2006	Prepared for hearing on motion to compel discovery.  AGT	185.00	2.36667	437.83
9/28/2006	Call from Doug regarding	305.00	0.16667	50.83
9/28/2006	Confirmed dep date of Willy Williams, learned of process of issuing subpoena out of Florida court, drafted documents requested for Williams' deposition. AGT	185.00	1.88333	348.42
9/29/2006	Subpoena of Willy Williams - sending out. AGT	185.00	0.01667	3.08
9/29/2006	Checked Bekins and Bentz's assessment of damages against Brooks. AGT	185.00	0.03333	6.17
10/2/2006	Research regarding issuance of subpoena by lawyer outside of district; issuance of subpoena to "managing agent" and what that means. Discussion with AGT about issuance of requests for admission, reviewing Bekins's Answer to Complaint to construct same.	185.00	1.75	323.75
10/3/2006	Revisions to requests for admissions.	305.00	1.46667	447.33
10/3/2006	(Second slip today) Conference with Doug, AGT to prepare for deposition.	305.00	4.3	1,311.50
10/4/2006	Conference with Doug, AGT to prepare for deposition. Attendance at deposition from 9:30 AM to 5:15 PM.	305.00	9.35	2,851.75
10/5/2006	Research regarding objection to form in deposition.  Memo to AGT on same.	305.00	0.6	183.00
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Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
10/6/2006	Received, reviewed defendants' letter regarding deposition of Mrs. Brooks. Call to Jonathan Stringer to discuss having a settlement conference first. Reviewed defendant Bekins' discovery responses. Letter to counsel. Letter to client for status.	305.00	1.21667	371.08
10/10/2006	Discussion with AGT regarding status of her discussions with counsel about settlement conference. Call to chambers to determine Judge Keys' availability. Call to Stringer to discuss.	305.00	0.35	106.75
10/11/2006	Drafting motion for settlement conference. Discussion with AGT about same, staying discovery. Discussion with opposing counsel about same. Forwarded draft to counsel; discussed same. Reviewed with AGT filing the motion. Email to and from Doug about status.	305.00	1.2	366.00
10/12/2006	Reviewed diary on documents from experts for defendants. Email to AGT for status on same.	305.00	0.1	30.50
10/16/2006	Discussed motion with JGB, attended motion in front of Keys, discussed with JGB, reviewed notes and JGB's email to Doug Brooks, discussed IIED causes of action for Jacquelyn and negligent infliction of emotional distress. AGT	185.00	0.98333	181.92
10/16/2006	Provided JGB with memo and research on attorneys' fees provision under Carmack, researched case law decided after Aug 2005 statutory amendment. AGT	185.00	2.2	407.00
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#### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 28 of 65 PageID #:2063

Converse & Brown, LLC

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**Invoice** 

105 West Adams Street

**Suite 2900** Chicago, Illinois 60603 Brown@ConverseBrown.com

Invoice # 322

Bill To:

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/20/2007

Terms:

Due on receipt

Date of activity	Description of activity	Rate	Time (in hours)	Amount
10/16/2006	Discussion with AGT about status call. Email to Doug about status. JGB	305.00	0.6	183.00
10/18/2006	VM from Doug Brooks regarding	185.00	0.25	46.25
10/19/2006	Researched jury verdicts on emotional damages. AGT	185.00	1.2	222.00
10/20/2006	Assessed Brooks' damages pursuant to our 26a disclosures and his damaged goods list. AGT	185.00	3.03333	561.17
10/20/2006	Received, reviewed jury verdicts from AGT; discussion about refining search.	305.00	0.25	76.25
10/24/2006	Reviewed answers to discovery from White and National.  AGT	185.00	1.03333	191.17
10/27/2006	Call from Doug, in preparation for settlement conference, to discuss Further discussion with AGT about how to proceed on same.	305.00	0.83333	254.17
10/27/2006	Continued to research jury verdict reporters for emotional distress damages from property loss. AGT	185.00	1.31667	243.58
10/27/2006	TC with Doug Brooks and JGB regarding in case, discussion with JGB on research and case law to have in front of judge, various arguments on arbitration and property damage. AGT	185.00	0.85	157.25
10/27/2006	Emailed Doug Brooks AGT	185.00	0.4	74.00
		Tot	al	

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**Invoice** 

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Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
10/27/2006	Found plaintiff's attorney in case in CA with \$3 million award with facts similar to ours. AGT	185.00	0.2	37.00
10/28/2006	Reviewed 37.2 letter from Stringer, reviewed disputed discovery answers, reviewed documents produced therewith, emailed Doug reviewed Doug's the sent over. AGT	185.00	0.83333	154.17
10/28/2006	Drafted letter in response to Stringer's 37.2 letter, e-mailed to JGB for corrections and/or additions. AGT	185.00	0.98333	181.92
10/28/2006	reviewed documents sent by CA attorney on \$3 mil damages case for IIED and other causes of action against movers. AGT	185.00	0.23333	43.17
10/28/2006	Drafted affidavit for Jacquelyn regarding attorney's fees 14708(d). AGT	185.00	0.41667	77.08
10/28/2006	Began drafting settlement proposal for defendants and Magistrate Judge Keys. AGT	185.00	0.86667	160.33
10/30/2006	Continued drafting settlement proposal, discussed content of proposal with JGB, discussed response to Stringer's 37.2 letter. AGT	185.00	5.95	1,100.75
10/30/2006	Revisions to response to 37.1 letter to counsel. JGB	305.00	0.25	76.25
10/31/2006	Continued reviewing settlement proposal. AGT	185.00	0.58333	107.92
10/31/2006	Discussed answers to interrogatories and requests to produce subject of Stringer's 37.2 letter with JGB. AGT	185.00	0.76667	141.83
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Alpharetta, GA 30022		

Date 1/20/2007

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Date of activity	Description of activity	Rate	Time (in hours)	Amount
10/31/2006	Continued drafting settlement proposal - calculation of	185.00	1.75	323.75
	damages. AGT			
10/31/2006	Further discussion with AGT about response to 37.2	305.00	1.21667	371.08
	letter. Revisions to same. Reviewing documents from			
	Doug for			
11/1/2006	Reviewed case documents from attorney in CA who had	185.00	1.65	305.25
	similar case, reviewed and responded to Brooks' email			
	regarding AGT			
11/1/2006	TC with Stringer regarding exchange of proposals. AGT	185.00	0.1	18.50
11/1/2006	Discussed settlement proposal with JGB. AGT	185.00	0.28333	52.42
11/1/2006	Assisted JGB in revising settlement proposal, researched	185.00	2.1	388.50
	revised settlement proposal, sent Stringer			
	confirmation of delivery. AGT	105.00	0.0	27.00
11/1/2006	Delivered courtesy copies to judge for settlement conference. AGT	185.00	0.2	37.00
11/1/2006	Reviewed Defendants' settlement offer, added up Bentz's	185.00	0.46667	86.33
11/1/2006	assessment. AGT	165.00	0.40007	00.55
11/1/2006	Reviewing settlement proposal. Revisions to same.	305.00	1.9	579.50
11/2/2006	VM from Stringer, TC with Stringer regarding service of	185.00	0.48333	89.42
11/2/2000	2nd round of discovery and requests to admit, discussed	100,000		
	effect of Rule 6(e) with JGB. AGT			
11/2/2006	Researched process server in FL for Simons. AGT	185.00	0.15	27.75
11/3/2006	Reviewed Defendants' settlement proposal. AGT	185.00	0.58333	107.92
111312000	Attioned Bottomania School Proposition			
		Tot	al	
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Date 1/20/2007

Terms:

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11/3/2006	Reviewed answers to request to produce, researched Fed.R.Civ.P. 36 for rules on requests to admit, discussed answers with JGB. AGT	185.00	2.23333	413.17
11/3/2006	Discussion with AGT about strategy of settlement conference in light of defendants' response.	305.00	0.55	167.75
11/7/2006	Reviewed and gathered favorable IIED cases for settlement conference and responded to IIED arguments in Ds' settlement proposal, responded to allegations regarding property damages, value of goods, 120 days to file claim, researched bundle branch blocks. AGT	185.00	3.28333	607.42
11/7/2006	Researched choice of law provisions for Illinois, researched choice of law for torts, breach of f.duty, violations of statutes, Consumer Fraud Act. AGT	185.00	1.5	277.50
11/7/2006	Drafted opening statement for settlement conference, reviewed Keys' previous decision on Carmack Amendment, reviewed 7th Circuit HED claims. AGT	185.00	1.2	222.00
11/8/2006	Memo: delivered documents as requested to opposing counsel in connection with Carmike Amendment Claim. CBW	185.00	0.25	46.25
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Alpharetta, GA 30022	

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Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
11/8/2006	Finished drafting opening statement for settlement conference, added in amounts from Bentz list and Doug's calculations, TC with Jacqueline regarding Doug's flight delay, prepared for settlement conference by discussing with JGB, attended settlement conference, prepared with Doug Brooks. AGT	185.00	7.33333	1,356.67
11/8/2006	Researched issue of attorneys' fees after settlement conference. AGT	185.00	0.71667	132.58
11/8/2006	Drafted notice of motion for Michele Doherty, revised request for documents to Doherty for Carmack amendment claims. AGT	185.00	0.71667	132.58
11/8/2006	Hand delivered notice of deposition and document rider for Doherty to Stringer. AGT	185.00	0.16667	30.83
11/8/2006	Drafted subpoena to Chubbs for documents regarding subrogation claim for property damage under Carmack Amendment. AGT	185.00	0.48333	89.42
11/8/2006	Discussion with AGT in preparation for settlement conference today with Judge Key. Conference with client in preparation for same. Attendance at settlement conference. Drafted request for "Your Rights and Responsibilities" document. Drafted subpoena to Chubb. Revisions to notice of deposition.	305.00	7.11667	2,170.58
11/9/2006	Researched Carmack cases. AGT	185.00	1.71667	317.58
		Tot	al	

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## Converse & Brown, LLC

105 West Adams Street Suite 2900 Chicago, Illinois 60603 312 789 9700 Brown@ConverseBrown.com

Invoice #

Bill To:

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022		

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
11/9/2006	Researched how to serve subpoena for documents, served subpoena via certified mail and U.S. Mail. AGT	185.00	0.85	157.25
11/9/2006	Reviewed Rights and responsibilities of moving booklet from Mayflower for arbitration provision. AGT	185.00	0.4	74.00
11/9/2006	Discussed attorneys fees under 49 USC 14708 and 14704, Carmack preemption, violation of CFR, documents from Bekins. AGT	185.00	1.43333	265.17
11/9/2006	Continued research on attorneys' fees under 14708 and COD. AGT	185.00	1.68333	311.42
11/9/2006	Research regarding failure to produce "Your Rights & Responsibilities" document in Rule 26(a) disclosure.  Re-review of Rule 26(a) disclosure.	185.00	0.4	74.00
11/9/2006	Drafted motion for sanctions under Rule 37 for failure to provide document in Rule 2(9a)(1) disclosure.	185.00	0.4	74.00
11/9/2006	Letter to counsel regarding dates for Doherty deposition.	305.00	0.1	30.50
11/9/2006	Researching "your rights and responsibilities", as applied by other moving companies and courts for Carmack Amendment liability.	185.00	4	740.00
11/9/2006	Researching attorney fee shifting provisions of Carmack and related federal statutes.	185.00	2.2	407.00
11/10/2006	Continued researching Rule 37 restriction of documents if not produced. AGT	185.00	0.05	9.25
11/13/2006	Reviewed JGB's research on attorney's fees with Stringer case. AGT	185.00	0.11667	21.58
		Tot	al	

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Mr. Douglas Brooks	
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Alpharetta, GA 30022	
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Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
11/17/2006	Discussed discovery requests with JGB and Defendant's	185.00	0.38333	70.92
	lack of response. AGT			
11/17/2006	Drafted letter to Stringer requesting answers to outstanding discovery, reviewed discovery requests and	185.00	2.11667	391.58
	correspondence. AGT			
11/17/2006	Organized case file with new correspondence, new	185.00	0.65	120.25
111112000	discovery requests, new orders, settlement conference notes. AGT			
11/17/2006	Drafted amended notice of deposition, drafted cover letter	185.00	0.58333	107.92
	explaining previous request for documents. AGT	Ī		
11/17/2006	Reviewed Ds' Supplement to 26a disclosures and answers	185.00	0.41667	77.08
	to P's 2nd Int, your rights and responsibilities when you			
	move pamphlet produced by Bekins. AGT			
11/18/2006	Reviewed rights and responsibilities of your move	185.00	0.26667	49.33
	document. AGT			
11/20/2006	Reviewed document requests for letter to Stringer	185.00	0.3	55.50
	requesting all outstanding discovery to be answered.			
	AGT			
11/20/2006	Reviewed subrogation letter from Chubbs. AGT	185.00	0.13333	24.67
11/21/2006	Discussed Chubbs subrogation letter with JGB, discussed	185.00	0.2	37.00
	needing to see list of paid for items. AGT			
11/27/2006	Discussion with outside counsel regarding subrogation	305.00	0.23333	71.17
	rights.			
		]		
		Total		

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#### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 35 of 65 PageID #:2070

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Converse & Brown, LLC

105 West Adams Street **Suite 2900** Chicago, Illinois 60603

Bill To:

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
11/27/2006	Followed up on subpoena to Chubb Insurance Group, TC with receptionist at Atlanta, GA office, found mail room clerk who signed for subpoena, transferred to claims adjuster handling Brooks' claim, left VM, reviewed rule on subpoenas of failure to produce. AGT	185.00	0.41667	77.08
11/27/2006	Reviewed answer to amended complaint to determine whether we can move for judgment on pleadings for Carmack claim; researched ability to make summary judgment on liability for causes of action in amended complaint, reviewed admissions in discovery. AGT	185.00	0.55	101.75
11/27/2006	Researched petition for interim fee petition. AGT	185.00	0.26667	49.33
11/27/2006	AGT	185.00	1.48333	274.42
11/28/2006	Received, reviewed, responded to AGT memo regarding partial summary judgment motion under Carmack Amendment.	305.00	0.2	61.00
11/28/2006	Researched subrogation cause of action for Chubb. AGT	185.00	1.33333	246.67
11/28/2006	TC with Candra Twitty insurance adjuster and Shakirah Stanford insurance subrogation adjuster, trying to fax file, discussed subrogation with JGB. AGT	185.00	0.33333	61.67
11/28/2006	Drafted memo on elements of Carmack amendment claim, what elements we have summary judgment. AGT	185.00	1.15	212.75
	<u> </u>	Tota	al	

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### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 36 of 65 PageID #:2071

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1/20/2007

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Date of activity	Description of activity	Rate	Time (in hours)	Amount
11/28/2006	Continued to research interim fee petitions after motions	185.00	0.81667	151.08
	for partial summary judgment. AGT			
11/28/2006	Began outlining draft of motion of partial summary	185.00	1.71667	317.58
	judgment, researched cases that spell out each of 3			
	elements for Carmack amendment claim, ferreted out			
	facts in cases that match our facts or facts that can be			
	distinguished. AGT	105.00	2244	125.02
11/29/2006	Continued researching cases with facts similar to ours for	185.00	2.36667	437.83
	elements of Carmack Amendment claim for summary			
	judgment, focusing on how to prove goods were in good condition at delivery - is affidavit enough, and whether			
	we have to prove that goods were damaged or the actual			
	amount of damages. AGT			
11/29/2006	Began to draft memorandum in support of motion for	185.00	3.6	666.00
11/25/2000	partial summary judgment using admissions from Bekins'	100.00	5.0	000101
	answer and defendants' responses to our requests to			
	admit. AGT			
11/29/2006	TC with Shakira Stanford from Chubb regarding case file,	185.00	0.43333	80.17
	when did Bekins get documents, when were these			
	produced, discussion with JGB regarding same. AGT			
11/30/2006	Revisions to motion for summary judgment.	305.00	0.91667	279.58
11/30/2006	Continued drafting memorandum in support of motion for	185.00	5.48333	1,014.42
	partial summary judgment. AGT		]	
				<u> </u>
		Total		

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# Converse & Brown, LLC

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Invoice #

Bill To:

Mr. Douglas Brooks	
3945 Brookline Drive	
Alpharetta, GA 30022	
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Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
11/30/2006	Drafted motion for partial summary judgment on	185.00	0.1	18.50
	Carmack Amendment claim. AGT			
11/30/2006	Reviewed and revised memorandum for summary	185.00	0.53333	98.67
	judgment with JGB's Changes. AGT			
11/30/2006	Began to draft statement of undisputed material fact for	185.00	1.28333	237.42
	partial summary judgment. AGT			
12/1/2006	Reviewing draft of motion for partial summary judgment.	305.00	1.86667	569.33
	Revisions to same.			
12/1/2006	Revised affidavit for Doug Brooks to sign as part of	185.00	0.76667	141.83
	motion for partial summary judgment. AGT			
12/1/2006	Continued drafting Local Rule 56.1 Statement of	185.00	3.23333	598.17
	Undisputed Facts for Motion for Summary Judgment.			
	AGT			
12/1/2006	Continued revising Memorandum for Partial Summary	185.00	0.86667	160.33
	Judgment pursuant to JGB's revisions. AGT			
12/1/2006	Continued drafting motion for partial summary judgment.	185.00	2.4	444.00
	AGT			
12/1/2006	Drafted exhibit list for motion for partial summary	185.00	0.61667	114.08
	judgment and scanned in exhibits, organized exhibits.			
	AGT			
12/1/2006	Continued revising statement of material facts with JGB's	185.00	0.55	101.75
	revisions and memorandum in support of motion for			
	summary judgment with JGB's revisions. AGT			
		Tota	al	
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## Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 38 of 65 PageID #:2073

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Invoice #

Bill To:

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022	

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
12/1/2006	Drafted certificates of service for exhibit list, motion for summary judgment, memorandum, and statement of undisputed facts, drafted notice of motion. AGT	185.00	0.28333	52.42
12/3/2006	Researched ability to collect special damages under Carmack Amendment and treatment of tariffs since demise of Interstate Commerce Commission which regulated tariffs. AGT	185.00	0.36667	67.83
12/4/2006	Drafted letter to Chubb requesting all documents for Brooks' claim, reviewed claims file produced for more missing information, discussed  Jackie Brooks, discussed same with JGB, reviewed various spreadsheets from Chubb for the settlement amounts of \$13,000, \$30,000 and \$32,000.  AGT	185.00	2.95	545.75
12/4/2006	Copied documents from Chubb (response to our subpoena) and bates numbered for production to Bekins.	185.00	0.98333	181.92
12/4/2006	Drafted transmittal letter to Stringer producing documents from Chubb which we received from our subpoena, packed documents to Stringer, reviewed subpoena and transmission of subpoena to Stringer. AGT	185.00	0.48333	89.42
	<u> </u>	Tot	al	

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## Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 39 of 65 PageID #:2074

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Mr. Douglas Brooks		
3945 Brookline Drive		
Alpharetta, GA 30022		

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
12/4/2006	Researched whether we file motion for partial summary judgment with Keys or Andersen, reviewed orders giving Keys permission to handle case, reviewed standing orders of judges, discussed with JGB whether we want Keys or Andersen, reviewed correspondence from Stringer regarding using Keys for case and not just for discovery issues. AGT	185.00	1.51667	280.58
12/4/2006	Emailed Doug and Jackie for list of items uncompensated for by Chubb. AGT	185.00	0.08333	15.42
12/4/2006	Reviewed insurance policies sent by Chubb, specifically reviewed subrogation clauses, deductible clauses and business losses clauses. AGT	185.00	0.85	157.25
12/5/2006	Delivered documents to opposing counsel - documents responsive to Chubbs inquiry. CBW	185.00	0.28333	52.42
12/5/2006	Checked new affidavit against old affidavit to ensure cited facts in memo and motion are same. AGT	185.00	0.23333	43.17
12/5/2006	Researched general summary judgment cases for Keys and Andersen on IIED, bailment, fiduciary duty, general cases against carriers, and IL Consumer Fraud Act claims, drafted memo on cases for JGB. AGT	185.00	4.51667	835.58
12/5/2006	Reviewed insurance policy subrogation provision in light of conversation with Jackie regarding what Chubb already paid for. AGT	185.00	0.18333	33.92
		Tota	al	

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### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 40 of 65 PageID #:2075

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Mr. Douglas Brooks	
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Alpharetta, GA 30022	
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Date

1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
12/6/2006	Review and discussion of insurance subrogation rights and discussion with colleague regarding rights of insurer to assume lawsuit. CBW	185.00	0.3	55.50
12/6/2006	Researched insurance policy for attorney's fees provision.  AGT	185.00	0.56667	104.83
12/6/2006	Discussion with JGB regarding.	185.00	0.18333	33.92
12/6/2006	Researched subrogation issue in Illinois insurance law, researched attorneys' fees with subrogation under Georgia law, attempted to call Shakirah insurance adjuster, attempted to call Shakirah's supervisor Jonathan Smith out of Atlanta. AGT	185.00	3.5	647.50
12/7/2006	Contacted Chubb to discuss subrogation, left message, called again and talked with Shakirah Stanford regarding subrogation, attorney's fees, Chubb's settlement with Fireman's Fund, Chubb's subrogation receipt. AGT	185.00	1.3	240.50
12/7/2006	Researched case law under Farrar - Supreme Court case limiting attorney's fees based on what was recovered.  AGT	185.00	0.38333	70.92
12/7/2006	Reviewed Andersen's order on motion to dismiss AGT	185.00	0.43333	80.17
12/7/2006	Researched purpose of subrogation receipt. AGT	185.00	0.36667	67.83
12/7/2006	Prepared deposition questions for JGB on dep of Michelle Doherty. AGT	185.00	0.16667	30.83
		Tot	al	······································

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### Case: 1:06-cv-01613 Document #: 92-2 Filed: 08/16/07 Page 41 of 65 PageID #:2076

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Invoice #

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Mr. Douglas Brooks	
3945 Brookline Drive	
Alpharetta, GA 30022	
	•

Date 1/20/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
12/7/2006	Discussed TC with Chubb subrogation agent Shakirah with JGB, discussed with Tom Shannon, discussed fee agreement with JGB and provisions in contingency fee agreement, drafted letter to Chubb saying our client can't sign the subrogation receipt. AGT	185.00	2.55	471.75
12/7/2006	Reviewed summary judgment motion in light of judge's granting of motion to dismiss White, revised certificates of service for motion, memo, statement of material facts.  AGT	185.00	1.45	268.25
12/8/2006	Delivered courtesy copy of motion to district judge. CBW	185.00	0.3	55.50
12/8/2006	Created courtesy copy for Judge Andersen, bound exhibits for courtesy copy, drafted letter to Stringer requesting documents from dep rider of Michelle Doherty. AGT	185.00	2.28333	422.42
12/8/2006	Reviewed supplemental 26a disclosures from Stringer and response to Doherty's dep rider, reviewed deposition documents for identification of Doherty as 30b6 witness.	185.00	0.9	166.50
12/8/2006 12/8/2006	Responded to email from Doug re Prepared questions for deposition of Doherty, reviewed documents produced by us and Bekins for mention of Doherty. AGT	185.00 185.00	0.08333 4.5	15.42 832.50
		Tota	al	\$70,355.83

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Bill To:

Mr. Douglas Brooks 3945 Brookline Drive		
Alpharetta, GA 30022		

Date 4/17/2007

Terms:

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Date of activity	Description of activity	Rate	Time (in hours)	Amount
12/6/2006	Reviewing status of subrogation claim law, attorney's fees law, discussion with AGT about strategy in pursuing claims, whether to file summary judgment motion. JGB	305.00	1,4	427.00
12/8/2006	Preparation for deposition on Monday. JGB	305.00	0.8	244.00
12/10/2006	Preparation on Sunday for deposition of Doherty. JGB	305.00	2.2	671.00
12/11/2006	preparation for and attendance at deposition of Doherty.  JGB	305.00	3.5	1,067.50
12/11/2006	Email to Doug regarding insurance on stored items. JGB	305.00	0.3	91.50
12/20/2006	Research CFR on cases holding failure to provide insurance policy to mover. JGB	305.00	0.95	289.75
1/9/2007	Revisions to draft letter to counsel regarding discovery disputes. JGB	305.00	0.45	137.25
1/10/2007	Review of file regarding dates of response letters to our request for discovery, form of same, outline of disputes; review of email on same; discussion with AGT on same; revisions to draft letter to opposing counsel regarding discovery. JGB	305.00	1.55	472.75
1/10/2007	Letter to Doug on status. JGB	305.00	0.23333	71.17
1/12/2007	Reviewing fact statement from Bekins. JGB	305.00	0.53333	162.67
1/13/2007	Researched new case law regarding discovery sanctions, researched motion for summary judgment while pending motion to dismiss. AGT	305.00	0.38333	116.92
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Date

4/17/2007

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Date of activity	Description of activity	Rate	Time (in hours)	Amount
1/15/2007	Continued to review Bekins' response to our motion for partial summary judgment, reviewed Bekins' response to our statement of material fact and additional material facts, drafted response arguments. AGT	305.00	1.58333	482.92
1/15/2007	Reviewing our Amended Complaint, Bekin's Answer, Bekins motion to dismiss, in connection with Bekins' claim that we cannot move for summary judgment when a motion to dismiss is pending. Draft for AGT on same. JGB	305.00	2.53333	772.67
1/16/2007	JGB and I had TC with Karen Fultz from Cozen O'Connor in Atlanta, they are Chubb's attorneys, regarding Chubb's subrogation receipt and asking Brooks to waive all claims. AGT	185.00	0.26667	49.33
1/16/2007	program and how they effectively banned Doug from using arbitration, CFR regulation requiring arbitration notice before move and during claim settlement process.	185.00	1,23333	228.17
1/16/2007	Researched 49 USC 14905. AGT	185.00	0.25	46.25
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4/17/2007

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1/19/2007	TC with Jackie Brooks regarding	185.00	0.18333	33.92
	AGT			
1/19/2007	Began researching reply to Bekins' response to our motion for summary judgment, researched filing summary judgment motion on same cause of action with pending motion to dismiss. AGT	185.00	1.01667	188.08
1/19/2007	Letter to Doug for status. JGB	305.00	0.3	91.50
1/20/2007	Began drafting reply brief to Bekins' response to motion for partial summary judgment. AGT	185.00	2.23333	413.17
1/22/2007	Continued drafting reply to Bekins response to our motion for partial summary judgment, drafted reply to Carmack Amendment arguments, while drafting I reviewed our statement of material facts, Bekins' responses and additional statement of material facts and our response to Bekins' 12b6 motion for Carmack arguments, also reviewed cited case law in the 12b6 motion. AGT	185.00	3.93333	727.67
1/22/2007	Reviewed spreadsheet Doug sent regarding uncompensated items by Chubb, discussed with JGB.  AGT	185.00	0.93333	172.67
1/22/2007	Sent email to Doug asking reviewed previous spreadsheet on Chubb claim Doug sent. AGT	185.00	0.2	37.00
		Tota	al	

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Alpharetta, GA 30022	

Date 4/17/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
1/22/2007	Reviewed Doug's answer to my questions totalled damages not paid for by Chubb, emailed amount to JGB. AGT	185.00	0.31667	58.58
1/23/2007	Continued drafting reply to Bekins' response to our motion for partial summary judgment, worked on Carmack Amendment claims. AGT	185.00	3.43333	635.17
1/23/2007	Continued researching Bekins' arguments regarding attorney's fees in its response brief, researched violation of regulations as basis for attorney's fees. AGT	185.00	0.78333	144.92
1/23/2007	Continued drafting reply brief to response to motion for summary judgment, drafted attorney's fee argument portion. AGT	185.00	0.98333	181.92
1/24/2007	Continued drafting reply brief to response to motion for summary judgment, drafted attorney's fee argument portion. AGT	185.00	3.18333	588.92
1/24/2007	Reviewed reply to response to motion for partial summary judgment. AGT	185.00	0.91667	169.58
1/24/2007	TC with Stringer regarding 37.2 letter, discussed our requests and their requests, he'll follow up with letter, discussed same with JGB and possible settlement offer. AGT	185.00	1.26667	234.33
1/24/2007	Discussed offer of judgment with outside counsel, Noonan. AGT	185.00	0.11667	21.58
	L.	Tota	al	

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4/17/2007

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1/24/2007	Discussed Stringer 37.2 conversation with JGB and what we need in response. AGT	185.00	0,3	55.50
1/24/2007	TC with Jackie regarding AGT and emailed reply about AGT	185.00	0.15	27.75
1/24/2007	Continued to research premature argument of response brief on filing motion to dismiss and summary judgment on same claim. AGT	185.00	0.01667	3.08
1/24/2007	Research regarding attorney fee shifting provisions in light of Bekins' failure to use proper "Your Rights and Responsibilities" language. Email to AGT on same. JGB	305.00	0.16667	50.83
1/24/2007	(Second slip today) Discussion with AGT regarding her 37.2 conference with opposing counsel, our requests for insurance information, Jackie Brooks' potential move to Jamaica, further depositions. JGB	305.00	0.4	122.00
1/24/2007	Review of AGT's draft of our reply brief. JGB	305.00	0.41667	127.08
1/25/2007	Continued drafting reply brief to response to motion for partial summary judgment, drafted reply to subrogation argument, reviewed additional facts stated by Bekins, reviewed produced documents. AGT	185.00	1.71667	317.58
		Tota	al	

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4/17/2007

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Date of activity	Description of activity	Rate	Time (in hours)	Amount
1/25/2007	Continued drafting reply to response to motion for summary judgment, drafted reply to argument that Doug isn't on bill of lading, reviewed cases cited by Stringer, researched own argument, drafted reply to argument that our motion is premature, revised JGB's arguments, researched third element of Carmack Amendment claim of damages, AGT	185.00	4.16667	770.83
1/25/2007	Revised reply brief with JGB's comments. AGT	185.00	0.33333	61.67
1/25/2007	(Multiple slips today) Continued revisions to fact statement, motion to strike at home (because brief due tomorrow and I will be in mediation all day on another matter.) JGB	305,00	1.2	366.00
1/26/2007	Put in citations to record in reply brief that JGB requested. AGT	185.00	1.48333	274.42
1/26/2007	Reviewed and revised response to Bekins statement of additional material facts.	305.00	0.91667	279.58
1/26/2007	Checked continuing validity of caselaw cited in reply brief, reviewed Missouri Pacific case. AGT	185.00	0.83333	154.17
1/26/2007	Gathered exhibits for response to statement of material facts, revised reply and response to material facts, revised documents per Andersen's standing order. AGT	185.00	3.36667	622.83
1/26/2007	Review of Plaintiff's Reply Memo in support of Partial Summary Judgment for consistency, to verify research and general final review. CBW	185.00	1.4	259.00
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4/17/2007

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1/29/2007 Pro 1/29/2007 Re 1/30/2007 Ga 1/30/2007 Cro 1/30/2007 Pro 1/30/2007 Pro 1/31/2007 Let 2/1/2007 Re 2/1/2007 Re (rec dep	tter of status to client following yesterday's deposition.  B	305.00 185.00 305.00 185.00 185.00 305.00	2.55 1.85 0.2 1.78333 0.61667 0.33333 7.2	777.75 342.25 61.00 329.92 114.08 61.67 2,196.00
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1/29/2007 Re 1/30/2007 Ga 1/30/2007 Cr 1/30/2007 Co 1/30/2007 Pre 1/31/2007 Let 2/1/2007 Ca 2/1/2007 Re (rec deg	puests. JGB quests. JGB thered exhibits for deposition. AGT eated courtesy copy of reply brief for Andersen. AGT epied documents for discovery. CBW eparation for and taking 30(b)(6) deposition of Bekins. B tter of status to client following yesterday's deposition. B	185.00 185.00 185.00 305.00	0.2 1.78333 0.61667 0.33333	61.00 329.92 114.08 61.67
1/30/2007 Cro 1/30/2007 Co 1/30/2007 Pre 1/31/2007 Let 2/1/2007 Cai 2/1/2007 Re (red dep	cated courtesy copy of reply brief for Andersen. AGT pied documents for discovery. CBW eparation for and taking 30(b)(6) deposition of Bekins. B tter of status to client following yesterday's deposition. B	185.00 185.00 305.00	0.61667 0.33333	114.08 61.67
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1/30/2007 Co 1/30/2007 Pre JG 1/31/2007 Let JG/ 2/1/2007 Cal pro 2/1/2007 Re (red dep	pied documents for discovery. CBW eparation for and taking 30(b)(6) deposition of Bekins. B tter of status to client following yesterday's deposition. B	305.00	0.33333	61.67
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2/1/2007 Cai pro 2/1/2007 Re (red dep	B	305.00		
2/1/2007   pro Re- (re- dep			0.4	122.00
(red dep	Il from Jackie regarding scheduling of deposition, occess for same. JGB	305.00	0.35	106.75
ava	viewed letter from counsel regarding deposition ceived by mail); reviewed Rule 30 regarding position notice; letter to counsel via fax regarding allability for deposition. JGB	305.00	0.3	91.50
2/2/2007 Cal pro and	Il from Jonathan Stringer, requesting inspection of operty for appraisal, deposition of Jacqueline Brooks, il second deposition of Doug Brooks; discussion about ne. Email to Doug and Jackie about	305.00	0.56667	172.83
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2/8/2007	Call with opposing counsel to confirm date of deposition, flight schedule, items to be appraised. Email to Doug and Jackie about	305.00	0.3	91.50
2/8/2007	Call from counsel for Chubb. Reviewed proof of loss form. Discussion with AGT regarding proof of loss form. JGB	305.00	1.3	396.50
2/9/2007	Call to and from Karen Fultz re: Chubb lien. Revisions to Sworn Statement; faxed same to her, JGB	305.00	1	305.00
2/15/2007	Reviewed motion to compel Doug Brooks' deposition. Began draft of response to same. JGB	305.00	1.3	396.50
2/16/2007	Reviewed local rules regarding fee dispute. Research of same, review of file on liability claims. Letter to counsel, proposing settlement of claims separate from fee disputes.  JGB	305.00	1.2	366.00
2/18/2007	Reviewed Doug's dep transcript in preparing for Jackie's dep, took notes on AGT	185.00	0.63333	117.17
2/19/2007	Continued to review Doug Brooks' deposition transcript for questions J. Stringer will ask Jackie and Doug answers. AGT	185.00	4.68333	866.42
2/19/2007	Called Dr. Malave's office (Doug's treating physician), left message for assistant to get back to me regarding reviewing D. Brooks' medical records. AGT	185.00	0.06667	12.33
2/19/2007	TC with Jackie Brooks regarding AGT	185.00	0,08333	15.42
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2/19/2007	Reviewed documents with Jackie's signature in preparation for J. Brooks' deposition. AGT	185.00	0.53333	98.67
2/19/2007	TC with Jackie to prepare her for deposition. AGT	185.00	1.71667	317.58
2/19/2007	Continued researching burden on re-deposing party.  AGT	185.00	0.45	83.25
2/19/2007	Call to Jackie regarding deposition, preparation for same. JGB	305.00	1.43333	437.17
2/20/2007	Reviewed research on standard for redeposing party and revised JGB's response to Bekins' motion to compel re-deposition of D. Brooks. AGT	185.00	0.81667	151.08
2/20/2007	Copied documents produced by both sides for J. Brooks' deposition. AGT	185.00	0.41667	77.08
2/20/2007	Travelled to O'Hare Airport, flew to Atlanta for deposition of J. Brooks. AGT	185.00	4.13333	764.67
2/20/2007	Continued preparing for J. Brooks deposition, reviewed possible questions Bekins' attorney would ask, Eviewed documents for Carmack moves, AGT	185.00	0.56667	104.83
2/20/2007	Reviewed request for inspection. Reviewed Rule 34 request. Email letter to counsel, requesting that they make a request. JGB	305.00	0.25	76.25
2/20/2007	Revisions to AGT draft of response to compel Doug Brooks' second deposition. JGB	305.00	0.5	152.50
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2/21/2007	Review and incorporation of suggested revisions to Plaintiff's response to Defendant's motion to compel production of Plaintiff for Second Deposition. CBW	305,00	1.76667	538.83
2/21/2007	Prepared J. Brooks for her deposition. AGT	185.00	1.51667	280.58
2/21/2007	Defended J. Brooks in her deposition. AGT	185.00	6.05	1.119.25
2/21/2007	Travelled to Atlanta airport and flew back to Chicago after J. Brooks' deposition. AGT	185.00	3.78333	699.92
2/22/2007	Assisted CBW in creating courtesy copy of response to motion to compel Doug's re-deposition. AGT	185.00	0.78333	144.92
2/22/2007	Reviewed Bekins' reply to our response to motion to compel D. Brooks re-deposition, reviewed case law from CBW on standard of re-deposition in preparation for motion hearing. AGT	185.00	0.71667	132.58
2/22/2007	Discussed J. Brooks deposition with JGB. AGT	185.00	0.15	27.75
2/23/2007	Continued to review case law from CBW on burden for re-deposing, reviewed previous court orders, prepared for motion argument, discussed motion with JGB. AGT	185.00	1.65	305.25
2/23/2007	TC with Jackie Brooks and Jeff Brown regarding settlement demand, redeposition of D. Brooks, copies of photos, discussion with J. Brown re same. AGT	185.00	0.3	55.50
2/23/2007	Discussion with JGB re motion hearing, what was argued in motion to re-depose D. Brooks, arguments, possible motions to reconsider, settlement demand. AGT	185.00	0.53333	98.67
2/23/2007	TC with Jackie re settlement amount and appraisal. AGT	185.00	0.11667	21.58
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2/23/2007	Scanned in Bekins' request to inspect to email to J.	185.00	0.13333	24.67
2/23/2007	Brooks. AGT Emailed J. Brooks Bekins' request to inspect, answered questions about	185.00	0.23333	43.17
2/23/2007	Calls to and from Jackie how to how to JGB	305.00	0.45	137.25
2/23/2007	Discussion with AGT about status in court on motion to compel Brooks for second deposition; discussion about whether to move to reconsider. Reviewed Brook's dep. Transcript, response to discovery. JGB	305.00	0.8	244.00
2/26/2007	Call with Doug Brooks' treating physician. Discussion with AGT about same, JGB	305.00	0.55	167.75
2/26/2007	Discussion with opposing counsel about offer of settlement. Legal research on fees. JGB	305.00	0.2	61.00
2/26/2007	Discussion with Dr. Malave regarding connection between heart attack and Bekins move. AGT	185.00	0.63333	117.17
2/27/2007	Discussed inspection of goods with JGB, VM to Brooks GA home re inspection dates, attempted to call numbers of Jackie's family in Jamaica to get in touch with Jackie, reviewed Bekins 2nd Int and National's Int and emailed to Doug. AGT	185.00	0.95	175.75
3/1/2007	Reviewed Stringer's letter of discovery issues and his answers to our discovery issues and compared with documents recently produced. AGT	185.00	1.03333	191.17
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3/1/2007	Reviewed Defendants' answers to our requests to produce, reviewed our complaint for possible necessary additional discovery to propound before discovery cut-off date. AGT	185.00	1.06667	197.33
3/1/2007	Reviewed Jackie's deposition notes for discovery items I have to supplement. AGT	185.00	0.85	157,25
3/1/2007	Discussion with AGT about defendant's latest request for the production of documents, which requests have already been made. JGB	305.00	0.81667	249.08
3/2/2007	Continued to review documents from Defendants' subpoena to Chubb. AGT	185.00	0.73333	135.67
3/5/2007	Called Jackie Brooks at home to discuss emailed Jonathan date. AGT	185.00	0.35	64.75
3/6/2007	Drafted letter to Stringer regarding dates for inspection appraisal. AGT	185.00	0.28333	52.42
3/7/2007	Assembled certified mail to serve Subpoena, mailed letter at Post Office. CPS	165.00	0.16667	27.50
3/7/2007 3/7/2007	VM to J.Brooks re dates for appraisal. AGT Drafted subpoena to White Moving, reviewed written description of the moving events drafted by White Moving employee to get questions, reviewed complaint to determine what documents we need from White Moving. AGT	185.00 185.00	0.01667 2.15	3.08 397.75
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3/8/2007	Mailed J. Stringer copy of subpoena on White Moving.	185.00	0.06667	12.33
3/8/2007	TC with Jackie regarding subpoenaed documents, extension of time. AGT	185.00	0.15	27.75
3/8/2007	Began draft of motion appealing Magistrate Key's order.  JGB	305.00	1.3	396.50
3/9/2007	Scanned in dep notice for Doug's second deposition and emailed to Doug. AGT	185.00	0.1	18.50
3/9/2007	Researched appealing Magistrate Judge Keys' order on second deposition. AGT	185.00	1.13333	209.67
3/9/2007	Drafted objection to Key's order allowing second deposition of D. Brooks. AGT	185.00	4.05	749.25
3/9/2007	Reviewed cases, local rules on appealing magistrates.  JGB	185.00	0.3	55.50
3/12/2007	Created courtesy copy of objection for Judge Andersen.	185.00	0.15	27.75
3/12/2007	Researched whether we have to notice up objection to discovery order. AGT	185.00	0.3	55.50
3/12/2007	Finalized motion to object for objection to Key's discovery ruling, filed with Andersen's deputy, sent courtesy copy to Stringer. AGT	185.00	0.96667	178.83
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3/13/2007	Discussion with AGT about discovery request from counsel. Reviewed documents. Call to Stringer to discuss same; left message. Further discussion with Stringer; we will produce the documents, subject to a confidentiality agreement. JGB	305.00	0.3	91.50
3/13/2007	Reviewing Jackie Brooks' deposition transcript. JGB	305.00	0.4	122.00
3/13/2007	Discussed with JGB defendants' request for medical records for past 5 years. AGT	185.00	0.2	37.00
3/13/2007	Emailed Jackie Brooks her dep transcript and errata sheets and explained how they work. AGT	185.00	0.16667	30.83
3/15/2007	Researched case law cited in defendants' 12b6 motion and/or motion to compel joinder of Chubb. AGT	185.00	1.88333	348.42
3/15/2007	Researched case law on subrogation and when subrogee becomes a subrogee - must they sign a subrogation receipt? AGT	185.00	1.13333	209.67
3/15/2007	Reviewed Defendants' 12b6 motion and/or motion to compel joinder. AGT	185.00	0.18333	33.92
3/16/2007	Finished reviewing documents produced by Chubb in response to Ds' subpoena. AGT	185.00	0.36667	67.83
3/16/2007	Drafted letter to J.Stringer regarding discovery that is still outstanding. AGT	185.00	0.88333	163.42
3/19/2007	Reviewed letter to J. Stringer regarding outstanding discovery requests. AGT	185.00	0.18333	33.92
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3/29/2007	Researched whether rejecting a Rule 68 offer causes Plaintiff to incur additional fees or lose attorneys fees. CPS	165.00	1.28333	211.75
3/30/2007	Continued drafting responses to defendant Bekins second request to produce. AGT	1,850.00	1.86667	3,453.34
4/2/2007	Reviewed research on costs, began preparing updated memo on this issue. CPS	165.00	0.28333	46.75
4/2/2007	Continued reviewing research on costs; preparing new memo. CPS	165.00	0.2	33.00
4/2/2007	(Second slip today) Continued reviewing research; preparing memo. CPS	165.00	0.71667	118.25
4/3/2007	Continued reviewing research and preparing memo on costs, CPS	165.00	0.63333	104.50
4/3/2007	Researched issue of costs in non-Section 1983 or 1988 cases. CPS	165.00	0.86667	143.00
4/4/2007	Continued researching 'costs' in cases filed under statutes other than 1983 and 1988. CPS	165.00	0.4	66.00
4/5/2007	Reviewed new research on 'costs'. CPS	165.00	0.31667	52.25
4/9/2007	Researched whether actual damages are included in an offer if they are not specified in the offer; whether response date is 10 days from receipt of offer or from date offer is made. CPS	165.00	1,95	321.75
4/10/2007	Reviewed research on Rule 68; drafted memo on findings. CPS	165.00	3.26667	539.00
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4/11/2007	Finished memo on FRCP 68; sent to JGB for review. CPS	165.00	1.1	181.50
3/3/2006	Filed completed service of process. AY	75.00	0.5	37.50
3/15/2007	Attendance in court on motion for objection to Keyes' ruling; obtained ruling on same, obtained ruling denying motion to dismiss. JGB	305.00	1.1	335.50
3/15/2007	Received, reviewed defendant's motion to compel joinder. Discussion with AGT about subrogation assignment; reviewed documents relating to assignment; call to Chubbs' counsel regarding subrogation assignment. Legal research about joinder. JGB	305.00	2.56667	782.83
3/15/2007	Drafted Rule 11 motion for sanctions re: joinder motion. Research on Rule 11 for appropriate relief, method of service of motion. IGB	305.00	0.78333	238.92
3/16/2007	Call from opposing counsel; he has not received any word from his client yet regarding settlement. JGB	305.00	0.25	76.25
3/19/2007	Received, reviewed subpoenas to St. Joseph's Hospital and to Dr. Jacques Lamothe. Letter to counsel, objecting to same. Discussion with AGT about our previous responses to discovery. JGB	305.00	0.43333	132.17
3/20/2007	Call from Stringer regarding deposition. Call to Stringer; left message. Reviewed proposed agreement from Chubb regarding representing their interests. Calls to Doug; left messages. Email to Doug about same. JGB	305.00	0.45	137.25
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3/21/2007	Discussion with AGT, Jackie Brooks regarding responses to outstanding discovery, Doug's deposition. JGB	305.00	0.35	106.75
3/22/2007	Discussions with opposing counsel regarding settlement.  JGB	305.00	0.85	259.25
3/27/2007	Research on necessary parties, "ratification letter"; letter to Fultz re: same. JGB	305.00	0.41667	127.08
3/28/2007	Call returned to Stringer. JGB	305.00	0.01667	5.08
3/29/2007	Reviewed memo from CPS about Rule 68 offer. Discussion with CPS about same. JGB	305.00	0.4	122.00
4/2/2007	Attendance in court before Judge Keyes for status. JGB	305.00	0.4	122.00
4/9/2007	Received, reviewed offer of judgment from opposing counsel. Call to counsel to discuss same. Research assignment to co-counsel on acceptance of same. Letter to clients, advising same. JGB	305.00	0.75	228.75
4/10/2007	Received, reviewed email from Jackie regarding offer of judgment. Response to same. Call to Doug, discussed same. Prepared draft of letter to counsel. JGB	305.00	0.43333	132.17
4/11/2007	Received, reviewed email from Doug regarding rejecting offer of judgment. Call to opposing counsel; left message. Discussion with counsel about same. JGB	305.00	0.85	259.25
4/13/2007	dISCUSSION WITH COUNSEL ABOUT SETTLEMENT. JGB	305.00	0.4	122.00
4/19/2007	Discussion with opposing counsel regarding settlement discussions. JGB	305.00	0.4	122.00
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4/19/2007	Researched whether,	165.00	1.33333	220.00
	The second of the second company	]		220.00
	CPS		İ	
4/20/2007	Revisions to letter to Stringer. Drafting response to same.  JGB	305.00	0.55	167.75
4/23/2007	Attendance in court on status. Discussion with counsel about same. EMail to client advising same. JGB	305.00	0.7	213.50
4/26/2007	Call to Karen Fultz regarding fees. Call to Stringer on status of settlement. JGB	305.00	0.75	228.75
5/3/2007	Call returned to counsel; agreed to extend time for response. JGB	305.00	0.2	61.00
5/4/2007	Call from Jackie seeking status; relayed same. JGB	305.00	0.2	61.00
5/4/2007	Attendance in court on status. JGB	305.00	0.65	198.25
5/8/2007	Letter to Fultz regarding fee proposal. JGB	305.00	0.5	152.50
5/18/2007	Attendance in court on status. Discussion with counsel following same. JGB	305.00	0.4	122.00
5/22/2007	Calls to and from Karen Fultz regarding settlement. JGB	305.00	1.21667	371.08
5/22/2007	Long telephone discussion with Doug and Jackie regarding settlement proposal; we will discuss same further tomorrow or Thursday.	305.00	0.75	228.75
5/23/2007	Discussion with JGB re: filing fee petition and researching the requirements to be considered a	165.00	0.16667	27.50
<del> </del>	prevailing party in a case that has been settled. CPS			<del>-</del>
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5/23/2007	Began researching what requirements must be met to be a prevailing party in the context of a settlement agreement; began drafting memo on same. CPS	165.00	2.65	437.25
5/23/2007	Attendance in court on status of settlement; obtained settlement conference date with Judge Keys for fee dispute. JGB	305.00	0.5	152.50
5/23/2007	Researching status of "prevailing party" for fee petition. Began drafting fee petition. Communication with Horwitz regarding affidavit at rate. JGB	305.00	1.4	427.00
5/24/2007	Finished researching what constitutes a prevailing party in the context of a settlement,	165.00	2.48333	409.75
5/24/2007	Reviewed Local Rule 54.3 and searched for sample fee petition. CPS	165.00	0.21667	35.75
5/24/2007	Began preparing outline for motion for attorneys' fees.	165.00	1.35	222.75
5/25/2007	Researched	165.00	0.18333	30.25
·		Tota	al	\$47,866.89

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**Suite 2900** Chicago, Illinois 60603

Bill To:

Mr. Douglas Brooks 3945 Brookline Drive Alpharetta, GA 30022

Date

8/12/2007

Terms:

Date of activity	Description of activity	Rate	Time (in hours)	Amount
6/5/2007	Researched whether settlement agreement which allows for Judge's signature complies with requirements necessary to be considered a prevailing party. CPS	165.00	0.2	33.00
6/5/2007	Discussion with opposing counsel about status of settlement agreement. JGB	305.00	0.65	198.25
6/6/2007	Discussion with JGB re: researching whether claims (particularly fee claims) brought pursuant to the Consumer Fraud Act are preempted by Carmack Amendment claims. CPS	165.00	0.08333	13.75
6/6/2007	Prepared letter to Stringer and corresponding documentation re: settlement of fee claims; gave same to Ruben to deliver. CPS	165.00	0.48333	79.75
6/6/2007	TC from Jonathan Stringer re: documents provided regarding Plaintiff's claim for attorneys' fees; order dated 5/29 stating that all documents regarding same are to be submitted to the Court by 6/11. Emailed JGB regarding same. CPS	165.00	0.23333	38.50
6/6/2007	Attendance in court with opposing counsel; discussion about settlement. JGB	305.00	0.95	289.75
6/12/2007	TC from Jonathan Stringer re: faxing signed settlement agreement to him; searched JGB's mail/faxes to find same (did not find/send it). CPS	165.00	0.16667	27.50
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6/13/2007	Researched a claim under the Consumer Fraud Act is preempted by a claim under the Carmack Amendment (particularly for fee purposes). CPS	165.00	2.13333	352.00
6/14/2007	Located signed settlement agreement from J. Brooks and faxed same to Stringer. CPS	165.00	0.2	33.00
6/14/2007	Emails to JGB re: results of research - Consumer Fraud Act claims are not preempted by the Carmack Amendment. CPS	165.00	0.16667	27.50
6/15/2007	Reviewed complaint and case law to distinguish our claims under the IL Consumer fraud act from those that were preempted by the Carmack Amendment in certain other cases. CPS	165.00	1.36667	225.50
6/15/2007	Prepared filing of information pertaining to fee petition; delivered same to Keys. CPS	165.00	0.8	132.00
6/15/2007	Completed research re: prospective application of a statutory amendment; and whether a motion in limine would be granted if a party failed to produce a document required to be produced pursuant to FRCP 26(a). CPS	165.00	1.46667	242.00
6/15/2007	Reviewed Bekins' June 12 letter, opposing a fee award. Drafted, assembled, arranged delivery of response letter to Judge Keys, copy to opposing counsel. JGB	305.00	4.3	1,311.50
6/18/2007	Attendance in court on settlement conference on fee petition. JGB	305.00	2	610.00
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6/19/2007	Reviewed LR 54.3 for procedure. Letter to counsel, requesting records. JGB	305.00	0.2	61.00
6/20/2007	Researched recent 7th Circuit decision in Robinson v. City of Harvey holding that lodestar award of fees is presumptively resonable. JGB	305.00	0.15	45.75
6/22/2007	Gathering data from computer for fee petition. JGB	305.00	0.8	244.00
6/25/2007	Discussion with opposing counsel and counsel for the insurer, regarding possible resolution of fees dispute.  JGB	305.00	0.4	122.00
6/27/2007	Letter to opposing counsel, responding to settlement offer on fee petition. JGB	305.00	0.55	167.75
7/2/2007	Prepared and delivered copies of Settlement Agreement to Keys' chambers, and requested that the agreement be entered, but not become of records. CPS	165.00	0.5	82.50
7/12/2007	Reviewed diary. Call to counsel regarding status on consent. JGB	305.00	0.1	30.50
7/13/2007	Attendance in court on status, consent to proceed before Judge Keys. JGB	305.00	0.5	152.50
7/13/2007	Emails to client, Chubb's counsel regarding status of disbursement. JGB	305.00	0.3	91.50
7/20/2007	Discussion with JGB re: reviewing fee petition from Bekins' attorney; preparing our fee petition; reviewing invoices received from Stringer. CPS	165.00	0.25	41.25
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7/23/2007	Reviewed PACER docket entries to determine whether an order had been entered terminating the referral to Judge Keys. CPS	165.00	0.16667	27.50
7/24/2007	TC with JGB re: whether Keys has entered order approving settlement agreement. TC to Keys' chambers regarding same. CPS	165.00	0.16667	27.50
7/24/2007	Began reviewing fee information from Stringer; broke down information into relevant categories, to determine hours spent in each, for months of March, April, May and June 2007. CPS	165.00	1.6	264.00
7/25/2007	Continued reviewing billing records received by Defendant's attorneys, sorting, and categorizing them, to determine amount of time spent on each on various aspects of the case, and time spent by each attorney. Completed months of September - December 2006, January - February 2007. CPS	165.00	1.91667	316.25
7/26/2007	Finished reviewing fee information sent by Stringer; breaking down time spent into relevant categories, for each of defendants' attorneys. Completed months of March - August 2006. CPS	165.00	1.28333	211.75
7/27/2007	2 TCs/VMs to Susan Beal, from Beyond Bookkeeping, to determine how to run searches by service item in Quickbooks, in order to prepare fee petition. CPS	165.00	0.08333	13.75
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7/27/2007	Prepared and delivered copy of settlement agreement and agreed order to Keys' chambers; faxed copy of accompanying letter to opposing counsel. CPS	165.00	0.53333	88.00
7/30/2007	Totaled all hours each defendants' attorney spent on various aspects of the case, in order to settle fee petition.	165.00	0.6	99.00
7/31/2007	Calls to and from counsel regarding fee petition, scheduling of status call. JGB	305.00	0.35	106.75
7/31/2007	Email to JGB re: breakdown of defendants' fee records; date fee petition is due to Keys. Email from JGB re: the amount of hours spent by each of our attorneys in this matter. Reviewed submission to Keys regarding fee petition to determine if we have calculated those hours.	165.00	0.31667	52,25
7/31/2007	TC to Susan from Beyond Bookkeepers re: running reports in QuickBooks, to complete fee petition. CPS	165.00	0.06667	11.00
7/31/2007	Reviewed our fee records to determine amount of time spent on case by each attorney; sent information to JGB for review. CPS	165.00	2.46667	407.00
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		Tota	al	\$6,277.50

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